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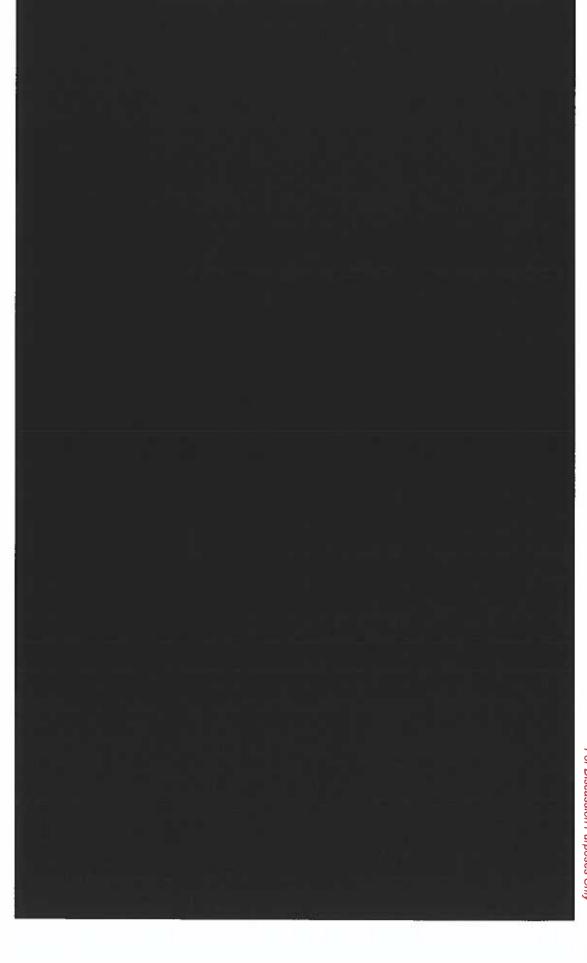
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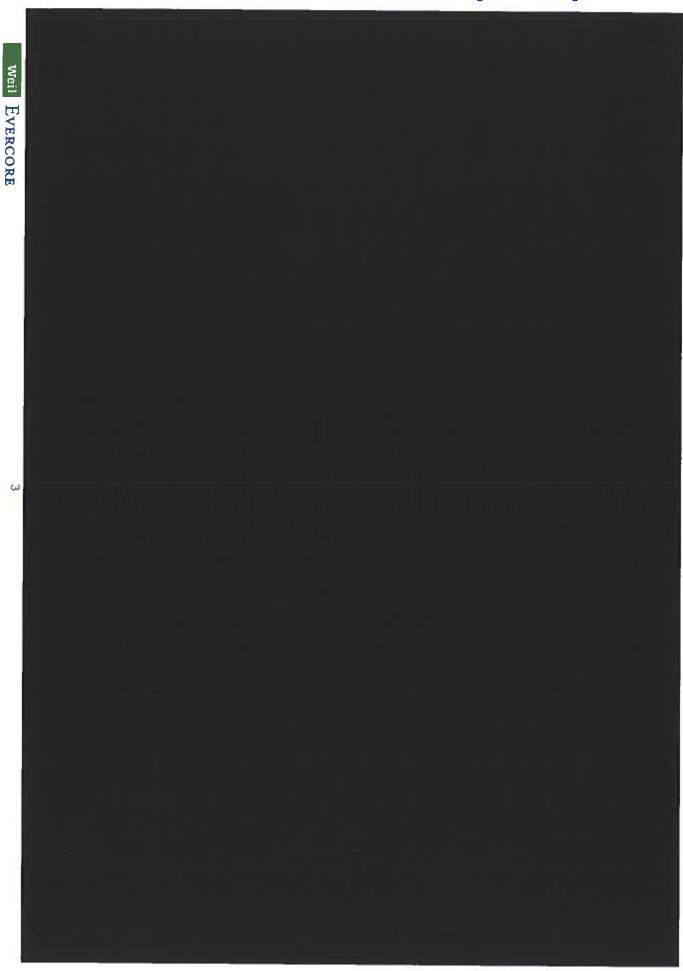
Special Master Ex Parte Meeting Discussion Materials Crystallex v. Bolivarian Republic of Venezuela

August 29, 2024



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Alter Ego Motion

These parties are seeking to hold PDVH liable for their judgments against PDVSA and the Republic on an

Three lawsuits brought in other courts by Girard Street, G&A Strategic Investments, and Gramercy pose a

threat to this sale process.

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Injunction is Necessary		Background			
 The Court has authority to enjoin parties from interfering with or trustrating its orders. The Special Master intends to file a motion in this Court seeking an injunction. The Special Master then intends to send letters to the Texas and New York courts hearing the Alter Ego Actions. 	■ The Special Master believes it is necessary to enjoin the Alter Ego Claimants from attempting to collect against PDVH or its subsidiaries to protect the sale process.	 Gramercy is an Additional Judgment Creditor, while Girard Street and G&A Strategic both sought to become Additional Judgment Creditors but did not meet the Step 5 (Writ) Deadline. 	All three claimants already appeared before this Court seeking recovery for these same judgments, which shows that the alter ego lawsuits are a clear attempt to circumvent the Special Master's sale process.	If successful, this may permit the claimants to attach the assets of PDVH (the CITGO Holding shares) to satisfy those judgments.	alter-ego theory.